



A Burlington
Environmental Inc.
Company

Dave C 39
WA 2917

11/30/1990

CERTIFIED MAIL

November 30, 1990

Barbara Smith
Washington Department of Ecology
Northwest Regional Office
4350 150th Avenue N.E.
Redmond, WA 98052

RECEIVED
DEC 03 1990
WASTE MANAGEMENT BRANCH

FILE COPY

Dear Barbara:

As we discussed in our phone conversation, Chempro is herein submitting to Ecology a revised draft workplan and schedule for obtaining adequate secondary containment at the Pier 91 facility pursuant to WAC 173-303-640(4)(b).

The reason for the revisions evolved from the confirmation from our Engineering Department in November, that the older tanks were not constructed on a continuous concrete pad, but instead were installed on a sand-filled ring wall foundation.

In order to provide for secondary containment which will meet requirements, Chempro proposes to limit the hazardous waste area as shown in the attachments and to weld a second steel bottom to waste tanks within the designated hazardous waste containment area. Please review over revised workplan and schedule and let us know of any concerns or comments.

We have reviewed the revised draft consent orders for both the Pier 91 and Georgetown facilities. I believe that we need to schedule one more meeting with EPA and Ecology in order to discuss final details in these orders. I will be contacting EPA and Ecology to schedule this meeting as soon as possible.

Sincerely,

Susan Donahue
Compliance Manager

cc: Cindy Gilder, Ecology
Dave Croxton, EPA

USEPA RCRA

3012853

CHEMICAL PROCESSORS, INC.

2203 Airport Way South . Suite 400 • Seattle, Washington 98134
(206) 223-0500 • FAX: 223-7791

PIER 91 TANK CONTAINMENT UPGRADE

Scope of Work

Objective - This project will involve upgrading the secondary tank containment at Chemical Processors Pier 91 facility. This upgrade is required under WAC 173-303-640 for the area handling hazardous materials.

Description - The berms in this area will be constructed to provide containment for 100% of the largest tank volume plus the 25 year/24 hour rainfall event. Repairs will be made to the existing concrete surface, and the surface graded to provide drainage. Blind sumps will be inspected and repaired as needed to insure adequate containment.

Detailed Scope of Work

- 1) Perform detailed engineering for containment upgrade including obtaining survey data to establish the required drainage slopes.
- 2) Relocate existing process piping and electrical wiring as required to facilitate berm installation.
- 3) Construct berms to isolate tanks from remaining tank farm.
- 4) Resurface the existing concrete slabs to provide a smooth well drained surface.
- 5) Install galvanized steel liners in the existing sumps and valve pits as required.
- 6) Install side nozzles and seal bottom piping penetration in tanks.
- 7) Conduct crack assessment of existing slabs to determine extent of required repairs. This assessment will be based on only repairing visible cracks. Install external waterstop between the tank shell and the existing concrete slab.
- 8) Installation of double bottoms in tanks to provide secondary containment.

- 9) Application of impervious coatings will be deferred pending resolution of the required corrective actions under the EPA 3008(h) Order.

Schedule of Implementation

By January 12, 1991:

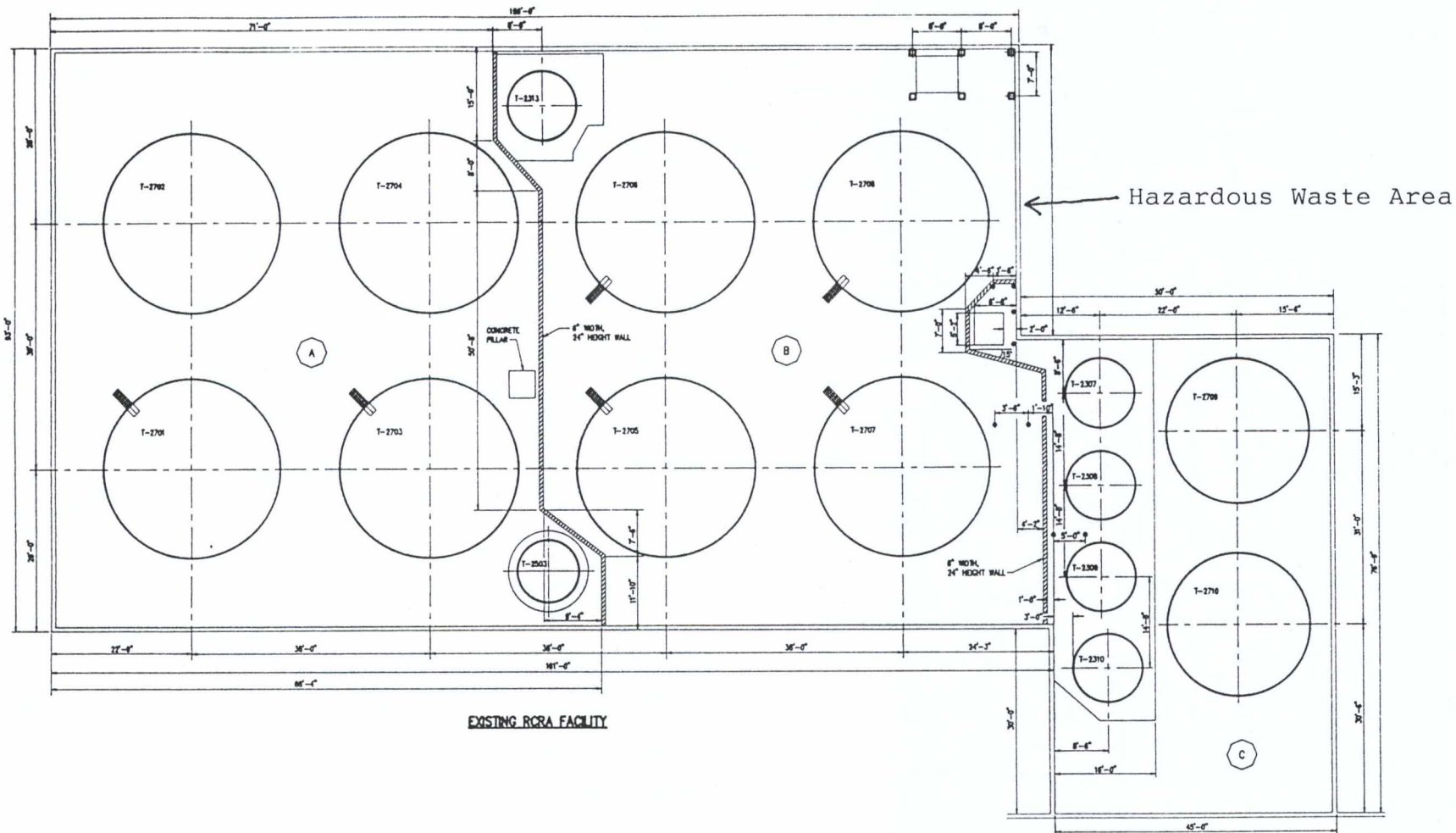
Items 1 through 7

By March 31, 1991:

Item 8: Complete installation of double bottoms in tanks.

After Resolution of Required Corrective Measures:

Item 9: Apply impervious coating to containment as soon as weather conditions permit.



1-30-82		DATE RELEASE	
1-30-82		1-30-82	
CHEMICAL PROCESSORS, INC. 2203 AIRPORT WAY SO., SUITE 400 SEATTLE, WASHINGTON 98134			
CONTAINMENT WALL ADDITION PIER 91 FACILITY			
DESIGNED BY	DATE	APPROVED BY	DATE
1-30-82	1-30-82		
1-30-82		1-30-82	